

EXHIBIT 4



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 21, 2010

BY FEDEX

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**Re: United States v. Paul Greenwood and Stephen Walsh,
09 Cr. 722 (MGC)**

Dear Counsel:

This letter provides additional discovery pursuant to Rule 16(a) of the Federal Rules of Criminal Procedure ("Fed. R. Crim. P.").

Disclosure By the Government

Based on your requests for discovery in this case, we write to provide you with the following:

1. An inventory prepared by the Receiver of certain hard drives removed from the Santa Barbara computers and DVD data disks containing files copied the hard drives.
2. Four DVD data disks prepared by the Receiver containing files from the indicated hard drives.

The Government recognizes that its obligation to provide discovery is of a continuing nature, and the Government will supplement this response if it obtains additional evidence and materials.

Sentence Reduction for Acceptance of Responsibility

Please be advised that this Office will oppose both the two-point reduction under the Sentencing Guidelines for acceptance of responsibility, U.S.S.G. § 3E1.1(a), and the additional one-point reduction available for defendants who plead prior to the Government's initiation of trial

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preparations, U.S.S.G. § 3E1.1(b)(2), in the event your client has not entered a plea of guilty two weeks prior to trial. We will follow this policy whether or not suppression or other pretrial motions remain outstanding after this date and even if the trial date has not been announced by the Court two weeks in advance of the trial.

Please contact us at your earliest convenience concerning the possible disposition of this matter or any further discovery which you may request.

Very truly yours,

PREET BHARARA
United States Attorney

By:


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INVENTORY — hard drives removed from Santa Barbara computers AND
DVD data disks containing files copied from same hard drives

1. One Western Digital hard drive S/N WD-WMAD1F292006 (JAMES CARDER MACHINE #2)
2. One Western Digital hard drive S/N WD-WMAL93169195 (SANTA BARBARA CPU)
3. One Maxtor hard drive S/N SG-0T0732-19661-44D-A3XI (MARK – OLD NO P/W)
4. One Seagate hard drive S/N 6RY7F1YB (MARK – NO. 2 NO P/W)
5. One Seagate hard drive S/N 6RY7M9EB (JAMES CARDER MACHINE #1)
6. One Seagate hard drive S/N 6RY7M84D (MARA – P/W LAR001)
7. Three DVD data disks – MARK NO. 2 NO P/W / CARDER MACHINE #1 and MACHINE #2
8. Three DVD data disks – MARA – P/W LAR001 and SANTA BARBARA CPU (LESS KRISTEN SNYDER)
9. Three DVD data disks – KRISTEN SNYDER FOLDER (SANTA BARBARA CPU)
10. Three DVD data disks – MARK – OLD NO P/W

TOTAL ITEMS THIS INVENTORY IS EIGHTEEN